



Miedel & Mysliwiec LLP

March 9, 2020

Hon. Naomi R. Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Hai Long Huang, 19-CR-853 (NRB)

Dear Judge Buchwald:

I write, with the consent of the government, to request an adjournment of the status conference in this case, currently scheduled for March 12, 2020.

A little more than one week ago, I received a hard drive from the government, containing the contents of my client's phones and computers that were seized on the date of arrest. The files on the hard drive are voluminous – over a terabyte of data – and many are in Chinese. It will take some time to analyze the contents of the hard drive to determine whether it contains relevant evidence for the case.

At this point I respectfully request an adjournment of about one month, although if my analysis suggests that more time is required to digest and translate important documents, I may ask the Court for additional time. As noted, the government consents to this request. If the Court grants the request, Mr. Huang agrees to waive time under the Speedy Trial Act to the next conference date.

Thank you very much for your consideration.

Respectfully submitted,

/s/

Florian Miedel
Attorney for Hai Long Huang

cc: AUSA Elizabeth Espinosa

The conference
is adjourned
until
April 14,
2020 at

3pm with
Speedy Trial
Time excluded.

So ordered
Naomi R. Buchwald
USDC

3/10/20